



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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Dirk Kempthorne, Governor  
C. Stephen Allred, Director

November 10, 2003

Ms. Kathleen Hain, Lead  
Environmental Restoration Program  
U.S. Department of Energy  
Idaho Operation Office  
850 DOE Place  
Idaho Falls, ID 83401-1563

RE: Draft Final Second Addendum Work Plan for OU 7-13/14 Comprehensive Investigation and Feasibility Study (RI/FS).

Dear Ms. Hain:

This letter is in response to the Department of Energy response to DEQ comments on the draft final Remedial Investigation and Feasibility Study (RI/FS) Work Plan Addendum for OU 7-13/14 Comprehensive Remedial Investigation and Feasibility Study. In accordance with the FFA/CO, the parties must now enter into the informal dispute resolution process at the Project Manager level to address outstanding issues that have been identified by the Agencies. DEQ's issues for this informal dispute resolution process are identified in this letter. Considerable work has been completed by all parties since DOE responded to Agency comments on the RI/FS Work Plan Addendum. Specifically, a meeting was held October 14-16 to address assumptions in the fate and transport modeling effort that have been a concern to the Agencies. During this meeting tentative agreement was reached in several areas to address DEQ's concerns. These agreements and actions items need to be formally agreed upon and incorporated into the work plan addendum during the informal dispute resolution process. DEQ concerns for the informal dispute resolution process are as follows:

Facilitated Transport of Plutonium

Both colloidal and colloidal size fractions are important concepts to this aspect of transport. As discussed during our meeting on October 14-16, this aspect of fate and transport needs to be addressed in the Remedial Investigation. (See DEQ General Comment #2, Specific Comment #11).

Mathematical Model

During the October 14-16 meeting, various aspects of the structure of the mathematical model that has been developed to evaluate risk and to assess remedial alternatives were discussed. Concerns were expressed regarding the thickness assigned spatially to the interbeds and the spatial distribution of hydraulic and transport variables such as porosity and permeability within the interbeds. Agreement must be reached on how these findings will be addressed in the Remedial Investigation Report.

#### Bench-Scale Versus Field-Scale

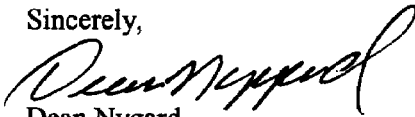
The lack of appropriate field scale tests of the proposed components of the remedial action raises concern that an inadequate combination of the components could result. For instance, a laboratory test to determine the permeability of a small sample of grout is not representative of the overall permeability of the grout on a field scale with waste where shrinkage, fracturing, and other permeability enhancing phenomena can occur. The lack of application of the proposed components within the RWMC has not been demonstrated. A field scale application of all of the components, both cold and hot tests, within the RWMC has not occurred. (DEQ Comment #2, #10)

#### Schedule

In July of 2002 DOE-ID proposed an accelerated schedule to issue the draft 7-13/14 RI/FS. DEQ has expressed concerns with this approach since the acceleration does not allow sufficient time for data to be gathered from the GEM project to be considered as part of the RI/FS in accordance with the schedule logic agreed to in the Pit 9 Agreement to Resolve Dispute. Contrary to DOE response to comments GEM does provide data and information necessary to validate assumptions being made in the RI. Therefore, DEQ requests that DOE-ID revert to the original 7-13/14 RI/FS schedule agreed to by all parties in the Pit 9 Agreement to Resolve Disputes in order to collect adequate information from the GEM retrieval, Pu specific colloidal modeling, and reassessment of interbed thickness for transport properties.

We look forward to working with you to reach resolution on these significant issues. We will be contacting you to arrange a time and date for our first meeting.

Sincerely,



Dean Nygard  
Remediation Program Manager

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cc: Wayne Pierre, EPA Region 10  
Reading File